

May 19, 2004

Mr. Peter Gold
Water Protection Division
USEPA REGION 3 - 3WP12
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Gold:

This letter is to submit some additional information in response to your review of the Bacteria TMDL for Looney Mill Creek, Botetourt County, Virginia, report originally submitted for your approval on April 23, 2004. Based on your comments, a few corrections have been made in the report.

Regarding your comment on the waste load allocation (Table 7), the design flows are corrected. The WLA for both point sources are correct as indicated in the original report. The TMDL has been developed using the data of 12 E.coli samples collected on a monthly basis and a 235 cfu/100 mL instantaneous standard.

A few other corrections and clarifications became necessary based on your review of the TMDL report. These have been made in the final report and are summarized in the attached document (Attachment 1).

Peter Gold
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I trust that you find this addendum satisfactory and look forward to receiving approval of the bacteria TMDL for Looney Mill Creek. If you have any question or need additional information, please contact me at (804) 698-4521.

Sincerely,

Ram Gupta
TMDL Environmental Specialist II

Attachment

Cc: Charles Martin, DEQ
Jutta Schneider, DEQ
Jason Hill, DEQ
File

Attachment 1 - Response Document on
Bacteria TMDL for Looney Mill Creek, Botetourt County, Virginia

Q: What are the land uses in the Back Creek watershed?

Answer: A large portion of the Back Creek watershed is Jefferson National Forest. Some timbering operations occur in this section of National Forest. There are several animal husbandry operations (mostly beef cow) and low intensity residential.

Q: The text under table 5, page 13, states that "Based on the sampling frequency only one criterion is used ..." , is that statement correct?

Answer: Yes, the samples used during past assessment periods were collected monthly or bi-monthly, so assessment staff used the instantaneous criteria. Assessment staff will apply the geometric mean standard when appropriate.

The TMDL has been developed using the data of 12 E.coli samples collected on a monthly basis and applying the 235 cfu/100 mL instantaneous standard.

Q: Table 7 on page 16, has the wrong flow for VA0023141 it should be 0.010 mgd and the wrong WLA for VAG0402055 it should be 1.74E+9.

Answer: Table 7 has been corrected. The correct design flow for VA0023141 and VAG402055 are 0.010 and 0.0006 MGD, respectively. The WLA for these point sources are correct as presented in the original report.

Q: In the third paragraph under Figure 13 on page 27 it mentions Reed Creek instead of Looney.

Answer: The typo has been corrected.

Q: Does the violation rate in Figure 12 go up because we are using the new criteria?

Answer: Yes, violation rate is increased due to new water quality criteria.